

evidence or oral testimony. Along with a limiting instruction, Rule 1006 summaries also may contain assumptions and inferences based on admitted testimony and evidence. *See United States v. Richardson*, 233 F.3d 1285, 1293-94 (11th Cir. 2000); *United States v. Gold*, 743 F.2d 800, 816 (11th Cir. 1984). Nonetheless, Rule 1006 summaries must be supported by evidence previously presented to the jury before they are admitted. *See United States v. Naranjo*, 634 F.3d 1198, 1213 (11th Cir. 2011); *United States v. Scrima*, 819 F.2d 996 (11th Cir. 1987).

The business and public records and evidentiary items described above are “voluminous writings, recordings, or photographs, which cannot conveniently be examined in court.” Fed. R. Evid. 1006. Before their admission at trial, the Government’s summary exhibits will be supported by previously admitted exhibits and prior testimony presented to the jury. Accordingly, the summary exhibits will be admissible under Rule 1006.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 27, 2023, I electronically filed the foregoing with the Clerk of the Court using CM/ECF.

/s/ Christopher J. Clark
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